

REMARKS/ARGUMENTS

Claims 1-3, 7-10 and 43-56 are pending in this patent application.

CLAIM REJECTIONS UNDER 35 USC 103

Claims 1-3, 7-10 and 43-56, as previously amended, are allowable over Robins et al. in view of Kitawaki and/or Anderson, because neither Robins et al. nor Kitawaki, nor Anderson, nor any combination thereof teaches or suggests every element of any of these amended claims. Therefore, the Examiner's rejection is respectfully traversed. Claims 1-3, 7-10, and 43-56 are allowable because neither Robins et al. nor Kitawaki teaches or suggests each and every element of any of these amended claims. Specifically, element (c) of claim 1 requires a lens calibration table corresponding to said optical system that includes information describing dust location and appearance as a function of optical parameters at least including exit pupil dimension of the lens assembly, or distance of dust from a surface of the electronic sensor array that corresponds to a focal plane of the lens assembly, or both. In a related case USSN 10/842,244, the Examiner relied upon "dust address" as provided in Fig. 4 and paragraphs [0029] and [0035] of Kitawaki to meet information describing dust location and appearance as a function of optical parameters including *distance of dust from a surface of the electronic sensor array* (the Examiner did provide any citation with regard to alternative *exit pupil dimension of the lens assembly*). However, these disclosures of Kitawaki et al. merely describe "x,y" positions of dust artifacts, i.e., appearing in a 2-d image captured with the camera of Kitawaki et al.

In stark contrast, a distance of dust from a surface of an electronic sensor array, as set forth, for example, at Applicants' claim 1, includes an orthogonal dimension to the "x,y" image plane. For example, if the dust is on a certain surface of a lens component of the lens assembly, then the distance of the dust from the sensor array would include a distance of that certain surface of the lens component at the position of the dust from the sensor array. That distance is in a direction that includes an orthogonal dimension to the

“x,y” image sensor plane that is not taken into account by Kitawaki et al. in dust addresses compiled at Fig. 4 or described at paragraphs [0029] or [0035], et seq.

Kitawaki discloses recording a dust map for specific focal lengths and aperture sizes. Kitawaki does not disclose a master dust map, nor transforming from the master map to match different focal lengths and apertures, which is a consequence of having a master dust map for different lens subsystems. That is, differences between different types of lens subsystems are not considered by Kitawaki, nor Robins et al. According to Kitawaki, a dust correction for a new lens is determined based on a stored dust map (presumably derived using a previous lens) for the same magnification (see paragraphs [0011]-[0012] of Kitawaki). Applicants’ advantageous invention as set forth at amended claim 1 considers, for example, that two lenses with the same magnification and aperture may not have the same exit pupil, nor distance from dust surface, and thus will not have the same transformations from the master dust map.

Neither Robins et al., nor Kitawaki, transforms a master dust map to create a manifestation of the master dust map for a specific lens and focal length, calculated as a transformation of the master dust map based on the lens calibration table. Instead, the table of Figure 4 in Kitawaki that is being relied upon by the Examiner represents a series of independently determined dust maps each of which is specific to (i) a particular lens, (ii) a particular focal length for that lens, and (iii) a particular aperture setting.

Claims 43 is allowable for the same reasons as claim 1, and claims 44-56 are dependent from claim 43 just as claims 2-3 and 7-10 are dependent from claim 1. Therefore, each of claims 1-3, 7-10 and 43-56 are allowable for these same reasons.

In view of the above, it is respectfully submitted that the application is now in condition for allowance. The Examiner’s reconsideration and further examination are respectfully requested. The Examiner is invited to call the undersigned attorney at 408-218-3315 to discuss any outstanding issues.

The Commissioner is authorized to charge any deficiencies in fees and credit any overpayment of fees to Deposit Account No. 50-4399.

Respectfully submitted,

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